

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

DJAVANSHIR D. GADJIEV,)	
)	
Plaintiff,)	
)	
v.)	CIVIL ACTION NO:
)	1 :12-CV-2700-JEC
)	
ATLANTA INDEPENDENT SCHOOL)	
SYSTEM, STEPHANIE A. BAILEY, in)	
Her individual capacity and THOMAS W.)	
GLANTON, in his individual capacity)	
)	
Defendants.)	
)	

**DEFENDANTS' RESPONSE TO PLAINTIFF'S
COUNSEL'S REQUEST FOR WITHDRAWAL**

Defendants, Atlanta Independent School System, Stephanie A. Bailey, in her individual capacity and Thomas W. Glanton, in his individual capacity (hereinafter referred to jointly as "Defendants"), respond to Plaintiff's Counsel's Request for Withdrawal as follows.

Defendants do not object to Plaintiff's Counsel's Request for Withdrawal since, assuming that the request is granted by this Honorable Court, Plaintiff, Djavanshir D. Gadjiev, (hereinafter "Plaintiff") has, among other things, the burden to prepare for discovery, motions, or trial or hire other counsel to prepare for discovery, motions, or trial when the trial date has been set. If Plaintiff fails or refuses to meet these burdens, then he may suffer adverse consequences in this

action including, but not limited to, dismissal of the case for failure to prosecute, default judgment or other action that may result in the dismissal of this case.

Respectfully submitted, this 21th day of October, 2013.

/s/Glinton R. Darien, Jr.
Glinton R. Darien, Jr., Esq.
Georgia Bar No. 684676

Assistant General Counsel
Attorney for Defendants
Atlanta Independent School System,
Stephanie A. Bailey, in her individual
capacity and Thomas W. Glanton, in
his individual capacity

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_____)	

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing DEFENDANTS' RESPONSE TO PLAINTIFF'S COUNSEL'S REQUEST FOR WITHDRAWAL has been filed electronically with the Clerk of Court, this 21st day of October, 2013, using the CM/ECF System, and that a true and correct copy of the foregoing will be provided by the Clerk of Court to the CM/ECF member named below:

Torin D. Togut, Esq.
Georgia Bar Number 713950
140 Hanarry Drive
Lawrenceville, Georgia 30046

/s/ Ginton R. Darien, Jr.
Ginton R. Darien, Jr., Esq.
Georgia Bar No. 684676

Attorney for Defendants

CERTIFICATE REGARDING FONT SIZE

I hereby certify that the foregoing DEFENDANTS' RESPONSE TO PLAINTIFF'S COUNSEL'S REQUEST FOR WITHDRAWAL uses Times New Roman, 14 point, as approved by the Northern District of Georgia in Local Rule 5.1(C).

/s/ Ginton R. Darien, Jr.
Ginton R. Darien, Jr., Esq.
Georgia Bar No. 684676

Attorney for Defendants